

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

GRAPHIC ARTS MUTUAL
INSURANCE COMPANY

Plaintiff,

v.

Civ. Action No. 1:06-CV-0246(JJF)

INDIAN RIVER SCHOOL DISTRICT
INDIAN RIVER SCHOOL BOARD,
HARVEY L. WALLS, MARK A. ISAACS,
JOHN M. EVANS, RICHARD H. COHEE,
GREGORY A. HASTINGS, NINA LOU
BUNTING, CHARLES M. BIRELEY,
DONALD G. HATIER, REGINALD L. HELMS,
M. ELAINE McCABE, LOIS M. HOBBS,
and EARL J. SAVAGE

Defendants.

JOINT STATEMENT OF REASONS

The defendants, by and through their undersigned attorneys, Drinker Biddle & Reath LLP, respectfully file this Statement of Reasons pursuant to the June 22, 2006 Court Order to explain to the Court why the pleadings should remain sealed. The plaintiff joins defendants for the purposes of this statement.

The Plaintiff's complaint and the Defendants' answer to Plaintiff's complaint, affirmative defenses, and counterclaim ("Pleadings") contain information relating to previously confidential settlement discussions that took place in the matter of *Dobrich, et al. v. Walls, et al.*, No. 05-120 (D. Del.) (the "Dobrich matter"). These discussions took place pursuant to a mediation order, which at the time required the parties to maintain confidentiality regarding the terms of the settlement discussions. Although there is no current court order requiring confidentiality, it is in the best interests of the parties to this case and the possibility of settlement that the Pleadings

remain sealed, as the parties to this case are currently engaging in further settlement discussions with the underlying Dobrich plaintiffs. Additionally, terms that could be incorporated into the current settlement, which may require confidentiality, are discussed in the Pleadings. For these reasons, the parties request that the Pleadings in this matter remain sealed for thirty days.

Dated: June 29, 2006

DRINKER BIDDLE & REATH LLP

/s/ Warren Pratt

Warren Pratt (DE Bar I.D. #4334)

Jason P. Gosselin (admitted *pro hac vice*)

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